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December 18, 2001

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DEC 18 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: SUPPLEMENT TO AMENDED E911 PHASE II WAIVER PETITION
Airtel Wireless LLC
CC Docket No. 94-102 /

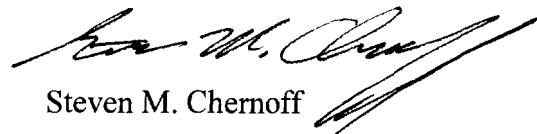
Dear Ms. Salas:

On behalf of Airtel Wireless LLC, the following is submitted as a supplement to the carrier's petition for waiver of Section 22.18 of the Commission's rules (filed Sept. 26, 2001) and the amendment to its waiver petition (filed Nov. 30, 2001):

- Letter from Edward W. Jacobs, Motorola's Director of Contracts and Licensing for Global Telecom Solutions Sector – North America, to James Brock, President of Airtel, responding to Airtel inquiry regarding compliance with the Commission's Phase II E911 requirements.

If there are any questions regarding this submission, please contact the undersigned.

Very truly yours,


Steven M. Chernoff

Enclosure

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

James Brock, President
Airtel Wireless LLC
2826 Via Florentine
Henderson, NV 89014

Dear Mr. Brock:

The following is our response to your inquiry regarding the ability of Motorola's Harmony system to meet Phase II enhanced 911 (E911) requirements.

At this time, it is our opinion that the most viable Phase II solution for your network is one that uses assisted GPS (A-GPS) technology. This technology combines the receipt of GPS information by the handset with network element functionality to parse the information as well as assist with providing more precise location fixes of the subscriber unit. It is readily apparent from simulations and other testing that A-GPS location solutions can be expected to provide accuracy levels in compliance with the FCC's requirements.

As you may know, Motorola is developing an A-GPS solution for carriers operating iDEN networks. Because the Harmony system will use handsets that are, in this respect, identical to those used in iDEN networks, Motorola proposes that it will supply A-GPS handsets for Airtel's Harmony system. It is our opinion that the handsets can be made available for testing on the Harmony system by mid-2002, which would allow Airtel to begin selling Phase II-capable handsets by October 1, 2002.

While the commonality of the handsets and cell site infrastructure used for Harmony and iDEN will allow Airtel to take advantage of product upgrades that are already in development, the iDEN and Harmony systems use different mobile switching offices (MSOs). The standard iDEN network is designed to serve extremely large numbers of subscribers over broad coverage areas, while the Harmony system is designed for a more limited subscriber base. Thus, the iDEN system uses a Nortel Networks MSO capable of processing in excess of 2 million telephone interconnect voice calls per day.

As a result of these differences, the network component of the Phase II location service proposed for iDEN networks is not transferable to Harmony. The network elements supporting location services in the iDEN system are currently proposed to be produced by Nortel Networks as part of its mobile switching center. This will be a Nortel proprietary implementation and will not be available in the Harmony system.

The approach being pursued for Harmony regarding support for location services is for Motorola to prepare the Harmony systems to accept a third party location system. In order to accomplish this, Motorola will publish an interface specification that describes how the GPS information collected from the handset will be provided to third party vendors of location service processing elements. Motorola is currently in the process of defining requirements for that interface. Following that activity, the interface specification will be written and provided to both Harmony system operators and the third party vendors. Motorola will work aggressively to identify a vendor for the network component of Airtel's Phase II solution.

If you should have any questions, please feel free to contact me at (847) 862-2090.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward W. Jacobs". The signature is fluid and cursive, with a large, stylized "J" at the end.

Edward W. Jacobs
Director, Contracts and Licensing
Global Telecom Solutions Sector – North America

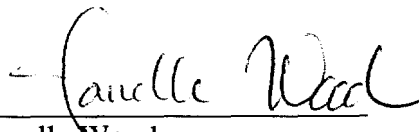
CERTIFICATE OF SERVICE

I, Janelle Wood, a secretary in the law office of Lukas, Nace, Gutierrez & Sachs, hereby certify that I have, on this 18th of December, 2001, sent via hand delivery, a copy of the foregoing SUPPLEMENT TO AMENDED E911 PHASE II WAIVER PETITION filed today to the following:

Thomas Sugrue, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C252
Washington, D.C. 20554

Jay Whaley
Wireless Telecommunications Bureau
Federal Communications Commission
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Janelle Wood